

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

<b>UNITED STATES OF AMERICA</b>	:	
	:	<b>CR CASE NO. 06-73</b>
<b>vs.</b>	:	
	:	
<b>DION L. BARNARD</b>	:	
<b>Defendant</b>	:	

**ORDER**

**AND NOW**, this            day of            , 2006, upon  
consideration of the within UNOPPOSED MOTION FOR EXTENSION OF TIME TO  
FILE DEFENDANT'S MOTIONS, it is hereby **ORDERED** and **DECREED** that all  
relief therein sought is granted and that all Motions on the above matter must be filed  
within forty-five (45) days of this Order.

**BY THE COURT:**

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**J.**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

<b>UNITED STATES OF AMERICA</b>	:	
	:	
vs.	:	<b>CR CASE NO. 06-73</b>
	:	
<b>DION L. BARNARD</b>	:	
Defendant	:	

**UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO FILE DEFENDANT'S MOTIONS**

The Defendant, Dion L. Barnard, by and through his attorneys, Erik C. Grandell, Esquire and Joseph A. Ratasiewicz, Esquire, moves this Court for an Order granting a forty-five (45) day extension for the filing of Motions in this matter for the following reasons:

1. Erik C. Grandell, Esquire and Joseph A. Ratasiewicz, Esquire, attorneys for Defendant have just recently been retained by Defendant, Dion L. Barnard, and his family to represent him in the within matter.
2. Counsel for Defendant have filed their Entry of Appearance with this Court on November 10, 2006. A copy of said Entry of Appearance is attached hereto as Exhibit "A" and made a part hereof.
3. Counsel for Defendant has been advised by Defendant's previous counsel that the deadline for the filing of Motions in this case is November 15, 2006.
4. With counsel's just being retained and the deadline for filing motions being November 15, 2006, there is not ample time for defense counsel to review the file and file the appropriate Motions.

5. Assistant U.S. Attorney, Shannon Thee Hanson, Esquire, has no opposition to this Motion.

**WHEREFORE**, it is respectfully requested that this Honorable Court grant a forty-five (45) day extension of time for Defendant to file appropriate Motions in this matter.

Respectfully submitted:

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**ERICK C. GRANDELL, ESQUIRE**  
**DE Attorney I.D. #2708**  
**1473 Spruce Street**  
**Wilmington, Delaware 19805**  
**484-888-3394**  
**Attorney for Defendant**

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**JOSEPH A. RATASIEWICZ, ESQUIRE**  
**Attorney I.D.#47453**  
**Flagship Corporate Center, Suite 320**  
**2 West Baltimore Pike**  
**Media, Pa. 19063**  
**610-891-0180**  
**Attorney for Defendant**

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<b>UNITED STATES OF AMERICA</b>	:	
	:	<b>CR CASE NO. 06-73</b>
<b>vs.</b>	:	
	:	
<b>DION L. BARNARD</b>	:	
<b>Defendant</b>	:	

**CERTIFICATE OF SERVICE**

I, Joseph A. Ratasiewicz, Esquire and Erik Grandell, Esquire, hereby certify that a copy of the within Unopposed Motion for Extension of Time to File Defendant's Motions has been forwarded to the following:

*Shannon T. Hanson, Esquire  
Assistant U.S. Attorney  
The Nemours Bldg.  
1007 North Market Street, Suite 700  
P.O. Box 2046  
Wilmington, Delaware 19899-2046*

via 1<sup>st</sup> Class U.S. Mail Postage Prepaid.

Respectfully submitted:

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**ERICK C. GRANDELL, ESQUIRE**  
**DE Attorney I.D. #2708**  
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